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December 29, 2020

Via ECFThe Honorable Gregory H. Woods
United States District Court
Southern District of New York
500 Pearl Street, Room 2260
New York, NY 10007MATTHEW W. ABBOTT
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TAURIE M. ZEITZER
T. ROBERT ZOCHOWSKI, JR.*NOT ADMITTED TO THE NEW YORK BAR
**ADMITTED TO THE CALIFORNIA BAR*Cardwell v. Davis Polk & Wardwell LLP et al.*
19-cv-10256-GHW (S.D.N.Y.)

Dear Judge Woods:

We write to confirm that, in accordance with this Court's December 20, 2020 Order (ECF 118), Davis Polk provided third-party consultants VallotKarp and Verna Myers with the materials specified by the Court. Both consultants expressed appreciation to Davis Polk for respecting the confidentiality of their proprietary materials in accordance with their contractual arrangements with the Firm. Neither, however, wishes to make a submission to the Court in this matter. In light of the third-party consultants' decision not to seek the sealing of their materials, Davis Polk withdraws those portions of its motion to seal the Second Amended Complaint that relate to the VallotKarp and Verna Myers materials (*see* ECF 103 at 1–2, as to Exhibits 5 and 7 to ECF 99 and 100).

Sincerely,

/s/ Susanna M. Buergel

Susanna M. Buergel